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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re) Chapter 11
)
CIRCUIT CITY STORES, INC.) Case No. 08-35653 (KRH)
)
et al., Debtors.) (Jointly Administered)
)

**MOTION FOR ADMISSION
PRO HAC VICE OF JAMES MICHAEL GILBERT**

Anne G. Bibeau (“Movant”), hereby moves the Court, pursuant to Local Bankruptcy Rule 2090-1(E), to enter an order authorizing James Michael Gilbert (the “Applicant”) of the firm of Steckbauer Weinhardt Jaffe LLP, in Los Angeles, California, to appear *pro hac vice* in the above-referenced bankruptcy cases before the United States Bankruptcy Court for the Eastern District of Virginia (collectively, the “Bankruptcy Case”) to represent County of Sonoma Tax Collector. In support of this Motion, Movant states as follows:

1. Movant is a member in good standing of the Bar of the Supreme Court of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia.

2. The Applicant is a member in good standing of the bar of the State of California, and is admitted to practice before all California federal courts. There are no disciplinary proceedings pending against the Applicant in any jurisdiction in which he is admitted to practice. *See Exhibit A attached hereto.*

3. Movant requests that this Court authorize the Applicant to file pleadings in, to appear and be heard at hearings concerning, and to participate otherwise in the Bankruptcy Case and related proceedings on behalf of County of Sonoma Tax Collector.

4. Movant and this firm will serve as co-counsel with the Applicant in the Bankruptcy Case and related proceedings.

5. The Applicant's Application is appended to this Motion as Exhibit A and incorporated by reference herein.

6. Notice of this Motion has been given to (a) the Office of the United States Trustee, (b) counsel for the Debtors, and (c) all persons receiving electronic notices in the Bankruptcy Case.

WHEREFORE, Movant respectfully requests that this Court enter an Order authorizing James Michael Gilbert to appear *pro hac vice* in the Bankruptcy Case and related proceedings and grant Movant such other and further relief as is just.

Dated: December 29, 2011

Respectfully submitted,

/s/ Anne G. Bibeau, Esq.
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CERTIFICATE OF SERVICE

I certify that on December 29, 2011, I will file the preceding with the Court's CM/ECF system which will cause a copy of it to be electronically served on all users registered to receive electronic notice in this case.

/s/ Anne G. Bibeau, Esq.
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